

FILED

October 04, 2021

CLERK, U.S. DISTRICT COURT
WESTERN DISTRICT OF TEXAS

BY: Yvette Lujan
DEPUTY

UNITED STATES DISTRICT COURT
for the
Western District of Texas
Pecos Division

United States of America)
v.)
)
Alejandro ACEVEDO-Galindo) Case No. 4:21-mj-1010
)
)
)

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of October 2, 2021 in the county of Culberson in the
Western District of Texas the defendant(s) violated:

Code Section	Offense Description
8 USC 1324(a)(1)(A)(ii)	The defendant did knowingly and in reckless disregard of the fact that certain aliens had come to, entered, and/or remained in the United States in violation of law, did guide, transport, move and attempt to guide and move said aliens within the United States in furtherance of said violation of law, and for the purpose of commercial advantage or private financial gain.

This criminal complaint is based on the facts found in the attached affidavit.

/s/ Elizabeth J. Hancock

Complainant's signature

Elizabeth J. Hancock, Special Agent

Printed name and title

**OATH TELEPHONICALLY
SWORN AT 9:00 A.M.
FED.R.CRIM.P. 4.1(b)(2)(A)**

Date: 10/04/2021

City and state: Alpine, Texas

Honorable Judge David B. Fannin

United States Magistrate Judge

Dick J. Morris
Judge's signature

Judge's signature

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS

Pecos Division

I, Elizabeth J. Hancock, being duly sworn, depose and state as follows:

I. PROBABLE CAUSE

1. On October 2, 2021, at approximately 0938 hours, Homeland Security Investigations (HSI) Alpine, Texas Special Agent (SA) Hancock received a call from Border Patrol Intelligence Agent (BPIA) Talavera from the Van Horn Border Patrol Station stating Border Patrol Agents (BPAs) encountered a failed 1 on 9 human smuggling event. SA Hancock was advised Watch Commander (WC) Gomez was the point of contact regarding the incident. After making contact with WC Gomez, SA Hancock was advised that a concerned citizen observed multiple individuals getting into a truck parked on the side of Interstate 10 near mile marker 130. This area is located in the Western District of Texas.
2. After observing the incident, the concerned citizen called the Van Horn Border Patrol Station to notify on-duty Agents of the situation. This information was released through the Border Patrol radio system and Texas Department of Public Safety (TxDPS) Troopers were given the information as well. TxDPS Trooper Foster advised he was in the area and would be on the lookout for the vehicle. A short time later, Trooper Foster observed a light-colored Ford F-150 bearing Texas license plate number PCK0954 traveling east bound on Interstate 10. Trooper Foster followed the vehicle and observed the driver to fail to signal lane change. Trooper Foster conducted a traffic stop on the vehicle at approximately 0645 hours this date and the vehicle stopped near mile marker 158.

3. WC Gomez was advised of the traffic stop and arrived to assist Trooper Foster. During contact, the driver of the vehicle was identified as Alejandro ACEVEDO-Galindo. There were five other individuals observed in the passenger compartment of the truck as well. Immigration inspections were conducted on the individuals in the vehicle and they all, including ACEVEDO-Galindo, admitted to being present in the United States without proper documentation to stay. While detaining the individuals inside the vehicle, WC Gomez found four more individuals in the bed of the truck hiding under a cover. These individuals also admitted to being present in the United States without proper documentation to stay. A 15-year-old male juvenile was located in the bed of the truck as well and it was found he was unaccompanied. All 10 individuals were transported to the Van Horn Border Patrol Station for processing.
4. SA Hancock arrived at the Van Horn station to assist in the investigation. SA Hancock attempted to interview ACEVEDO-Galindo. After being advised of his rights, ACEVEDO-Galindo stressed concerns to SA Hancock about not being sure if he would be able to answer the questions to her liking, as well as alluding the to fact that he may be more comfortable with an attorney present so as not to make his situation worse. Questioning was ended at this point.
5. Upon conducting a criminal history check of ACEVEDO-Galindo, it was found that he had multiple arrests for violations of 8 USC 1325, *Illegal Reentry*, including dates showing to have occurred on March 12, 2012, and May 6, 2015. It appeared ACEVEDO-Galindo was incarcerated for the 2015 arrest for 7 days.

6. The United States Attorney's Office was notified of the event, and they accepted the charge against Alejandro ACEVEDO-Galindo for a violation of 8 USC 1324(a)(1)(A)(ii), *Transporting Illegal Aliens.*

II. CONCLUSION

Based on the facts and circumstances stated above, I submit that there is probable cause to believe that Alejandro ACEVEDO-Galindo has committed a violation of Title 8, United States Code, Section 1324(a)(1)(A)(ii), *Transportation of Illegal Aliens.*

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

/s/ Elizabeth J. Hancock

Elizabeth J. Hancock
Special Agent
Homeland Security Investigations



The Honorable David B. Fannin
United States Magistrate Judge
Western District of Texas (Pecos Division)